

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

WISCONSIN ALUMNI RESEARCH  
FOUNDATION,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 3:14-cv-00062-WMC

**DEFENDANT APPLE INC.'S PROPOSED SPECIAL VERDICT FORMS**

**SPECIAL VERDICT FORM  
(LIABILITY)**

**INFRINGEMENT**

1. Has WARF proven by a preponderance of the evidence that Apple directly infringes any of the following claims of U.S. Patent No. 5,781,752 (the '752 patent)?

Please answer "YES" or "NO" as to each claim for both Literal Infringement and Infringement under the Doctrine of Equivalents.

Claim 1

Literal Infringement: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Doctrine of Equivalents: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Claim 2

Literal Infringement: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Doctrine of Equivalents: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Claim 3

Literal Infringement: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Doctrine of Equivalents: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Claim 5

Literal Infringement: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Doctrine of Equivalents: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Claim 6

Literal Infringement: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Doctrine of Equivalents: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Claim 9

Literal Infringement: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Doctrine of Equivalents: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

2. Has WARF proven by a preponderance of the evidence that Apple is vicariously liable for a third party's infringement of the '752 patent?

Please answer "YES" or "NO" for both Samsung and Taiwan Semiconductor Manufacturing Corporation.

Samsung: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Taiwan Semiconductor  
Manufacturing  
Corporation: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

3. Has WARF proven by a preponderance of the evidence that Apple indirectly infringes the '752 patent?

Please answer "YES" or "NO" for Induced Infringement, Contributory Infringement, and § 271(f) Infringement.

Induced Infringement: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

Contributory Infringement: YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

§ 271(f) Infringement YES \_\_\_\_\_ (for WARF) NO \_\_\_\_\_ (for Apple)

**INVALIDITY**

4. For each claim of the '752 patent listed below, has Apple proven by clear and convincing evidence that the claim is invalid?

Please answer "YES" or "NO" as to each claim for Anticipation and Obviousness.

Claim 1

Anticipation: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Obviousness: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Claim 2

Anticipation: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Obviousness: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Claim 3

Anticipation: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Obviousness: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Claim 5

Anticipation: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Obviousness: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Claim 6

Anticipation: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Obviousness: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Claim 9

Anticipation: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

Obviousness: YES \_\_\_\_\_ (for Apple) NO \_\_\_\_\_ (for WARF)

**SPECIAL VERDICT FORM  
(DAMAGES)**

1. What amount has WARF proven by a preponderance of the evidence that Apple should pay as a reasonable royalty for its infringement?

\$ \_\_\_\_\_

**SPECIAL VERDICT FORM  
(WILLFULNESS)**

1. Has WARF proven by clear and convincing evidence that Apple actually knew, or should have known, that its actions constituted an unjustifiably high risk of infringement of a valid and enforceable patent?

YES \_\_\_\_\_ (for WARF)      NO \_\_\_\_\_ (for Apple)

Dated: August 28, 2015

Respectfully submitted,

/s/ Derek Gosma

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